

JAN 25 1982

Headquarters' Concurrence

Cheryle Micinski
Attorney, CNSL-LEGL

File - Perfection Manufacturing Company

On January 20, 1982, I spoke with Heidi Hughes from Headquarters regarding concurrence on the §3008 Compliance Order with penalties and warning letter to be issued to Perfection Manufacturing Company, St. Louis, Missouri. We discussed the regulatory violations listed in paragraphs 8 and 9 under the Determination of Violation. I agreed with Heidi that these were technically Class III violations but due to the circumstances I felt that they should be Class I violations and thus included in the Compliance Order and subject to penalties. I told her that Perfection Manufacturing had not been truthful with EPA in the past regarding disposal and storage of hazardous waste, that these regulations related to that problem and therefore should be Class I violations. After conferring with her supervisor, it was agreed that 8 and 9 could remain in the Compliance Order as Class I violations due to the particular circumstances. Heidi suggested that I reverse the order of the paragraphs in the Terms for Compliance, which I did. I made the other minor corrections which she suggested and also sent a copy of the warning letter to the registered agent for Perfection along with the Compliance Order. Heidi indicated that with the changes as made as had been suggested, the Order had received Headquarters' concurrence and could be sent. I will carbon copy her on the Order as sent to the company.

CNSL/LEGL/CLMicinski:ksh:1-21-82:Doc.3281A



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RCRA RECORDS CENTER

CONCURRENCES							
SYMBOL	LEGL	LEGL	LEGL				
SURNAME	MICINSKI	SHIEL	Gatterlee				
DATE	1-22-82	1/22/82	1/22/82				